

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PURDUE PHARMA PRODUCTS L.P.,
NAPP PHARMACEUTICAL GROUP LTD.,
BIOVAIL LABORATORIES INTERNATIONAL,
SRL, and ORTHO-MCNEIL, INC.,

Plaintiffs/Counterclaim-defendants,

v.

PAR PHARMACEUTICAL, INC. and
PAR PHARMACEUTICAL COMPANIES, INC.,

Defendants/Counterclaim-plaintiffs.

C.A. No. 07-255-JJF
(CONSOLIDATED)

**SECOND NOTICE OF DEPOSITION OF DEFENDANTS
PAR PHARMACEUTICAL, INC. AND PAR PHARMACEUTICAL
COMPANIES, INC. PURSUANT TO RULE 30(B)(6), FED. R. CIV. P.**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, plaintiffs Purdue Pharma Products L.P. and Napp Pharmaceutical Group Ltd. (collectively "Purdue") will take the deposition by oral examination of defendants Par Pharmaceutical, Inc. and Par Pharmaceutical Companies, Inc. (collectively "Par").

The deposition will commence at 10:00 am on April 11, 2008 at the offices of Ropes & Gray, 1211 Avenue of the Americas, New York, New York or at such other time and place as counsel may agree.

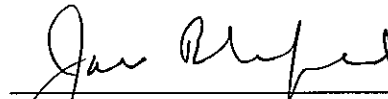
PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Par is required to designate one or more officers, directors, managing agents, or other persons who will testify on its behalf with respect to each of the topics set forth in the attached Schedule A. In addition, Par is requested to provide plaintiffs' counsel with written notice, at least one week in advance of the deposition, of the name and title of each

witness who will testify on behalf of Par, and the particular topic(s) set forth in Schedule A as to which each such witness will testify.

The deposition will be taken before a Notary Public or other officer authorized by law to administer oaths, and will continue from day to day until completed, weekends and holidays excepted, with such adjournments as to time and place that may be necessary. The deposition will be recorded by sound, video and/or stenographic means.

You are invited to attend.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP



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March 20, 2008

SCHEDULE A

DEFINITIONS

Purdue incorporates by reference the Definitions set forth in Purdue's First Set Of Requests For Production Of Documents And Things, served on August 23, 2007.

DEPOSITION TOPICS

1. The preparation, filing, and attempts to secure FDA approval of any controlled release tramadol hydrochloride formulation by or for Par, including but not limited to ANDA No. 78-783 and any amendments or supplements thereto.

2. Any communications between Par and the FDA relating to any controlled release tramadol hydrochloride formulation by or for Par, including but not limited to communications relating to ANDA No. 78-783 and any amendments or supplements thereto.

3. Par's Paragraph IV Certifications and/or ANDA Notice, including but not limited to (i) any statements or certifications, and documentation relating thereto, submitted by Par to the FDA, asserting that the '887 patent is invalid, unenforceable and/or not-infringed; (ii) Par's letter dated March 27, 2007 to Biovail Laboratories Int'l SRL ("Biovail") and Euro-Celtique S.A. regarding "Ultram[®] ER; route of administration: oral; strength: 200 mg," (iii) Par's letter dated May 21, 2007 to Biovail and Purdue regarding "Ultram[®] ER; route of administration: oral; strength: 100 mg and 200 mg," and (iv) Par's letter dated September 24, 2007 to Biovail and Purdue regarding "Ultram[®] ER; route of administration: oral; strength: 300 mg."

4. The decision by Par to omit from its regulatory filings any data, test results, or analysis generated in the research or development of any tramadol hydrochloride formulation, including but not limited to Par Tablets; the identity of such data, test results or

analysis; the reason(s) why such data, test results, or analysis were omitted from Par's regulatory filings; and the individual(s) that made the decision to omit such data, test results, or analysis.

5. The identity and location of documents concerning each of the foregoing topics.

6. The identity and location of persons most knowledgeable about each of the foregoing topics.

CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2008 I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing to:

Frederick L. Cottrell, III, Esquire
Steven J. Fineman, Esquire
RICHARDS, LAYTON & FINGER, P.A.

Richard D. Kirk, Esquire
THE BAYARD FIRM

Mary W. Bourke, Esquire
CONNOLLY BOVE LODGE & HUTZ LLP

I further certify that I caused to be served copies of the foregoing document on March 20, 2008 upon the following in the manner indicated:

Frederick L. Cottrell, III, Esquire
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